

REPORT TO THE CITY COUNCIL BY THE CITY INTERNAL AUDITOR

AUDIT OF THE DEPARTMENT OF COMMUNITY DEVELOPMENT, REHABILITATION ASSISTANCE PROGRAMS

INTERNAL AUDIT REPORT 130110-07

JULY 30, 2010



July 30, 2010

Councilwoman Joyce Bowman
Chairman, Shreveport City Council

Dear Councilwoman Bowman:

Subject: IAR 130110-07 - Audit of the Department of Community Development,
Rehabilitation Assistance Programs

Attached please find the report mentioned above. Management comments are included in the report.

Sincerely,

Leanis L. Graham, CPA, CIA
City Internal Auditor

bp

EXECUTIVE SUMMARY
AUDIT OF THE DEPARTMENT OF COMMUNITY DEVELOPMENT,
REHABILITATION ASSISTANCE PROGRAMS
INTERNAL AUDIT REPORT (IAR) 130110-07

The purpose of the executive summary is to convey in capsule form the significant issues of the audit report. The executive summary is a vehicle for reviewing the report and should only be used in conjunction with the entire report.

INTRODUCTION

In the "Rehabilitation Assistance" programs, Community Development contracts for home repairs and construction. Programs include Emergency Repair, Paint Your Heart Out, Wheelchair Ramp, World Changers, Raise the Roof, Limited Repair and Reconstruction.

RECOMMENDATION EVALUATION RISK CRITERIA

The chart below summarizes the recommendations outlined in the report and our evaluation of risk for the recommendations. The risk levels were determined based on the possible results for the entity if the recommendation is not implemented. This report contains six findings with ten recommendations. As noted throughout the report, management has addressed many of the recommendations.

<i>Risk Levels</i>	<i>Recommendations</i>
High Risk Possibility of fraud, waste, and abuse of City assets; Interrupted and/or disrupted operations; Entity's mission not being met; Adverse publicity.	<ul style="list-style-type: none">• Organize project files and review for completeness. (Finding 1)• Coordinate inspections and require documented proof of passed inspections before partial or final payments. (Finding 2)• Comply with payment procedures to prevent unauthorized payments. (Finding 3)
Medium Risk Possibility of continuing, significant operating inefficiencies and high-level non-compliance issues.	<ul style="list-style-type: none">• Utilize the contractor's application from the City's Fair Share Office to verify the completeness and accuracy of contractor information. (Finding 4)• Review contractors for compliance with State registration requirements. (Finding 4)• Enhance the scope of background checks on contractors. (Finding 4)• Inquire about investigations and convictions on the contractor's application. (Finding 4)
Low Risk Possibility of continuing operating inefficiencies and some low-level non-compliance issues.	<ul style="list-style-type: none">• Document explanation to homeowners of work to be performed. (Finding 5)• Perform surveys and document discussions with participants. (Finding 6)

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AUDIT OF THE DEPARTMENT OF COMMUNITY DEVELOPMENT, REHABILITATION ASSISTANCE PROGRAMS INTERNAL AUDIT REPORT (IAR) 130110-07

OBJECTIVES

We have completed an audit of the Department of Community Development, Rehabilitation Assistance Programs. This audit was performed as a result of internal control weaknesses documented during the course of fieldwork for the Investigative Report IR09-06: "Alleged Misconduct in the Department of Community Development, Housing Bureau, Neighborhood Revitalization Program". The objective of this audit was to determine the economy and efficiency of operations of the division.

SCOPE AND METHODOLOGY

The scope of the study of internal control was limited to the general controls surrounding our objectives for the operating years of 2008 and 2009. Audit procedures applied included the following: reviewing applicable records and documents, and interviewing operating personnel and management.

We conducted this audit in accordance with generally accepted government auditing standards, except that a peer review has not been performed, and included such test of procedures and controls as considered appropriate. We believe that the evidence obtained provides a reasonable basis for our findings, conclusions, and recommendations based on our audit objectives.

BACKGROUND

In the "Rehabilitation Assistance" programs, Community Development coordinates with homeowners and contracts for home repairs and construction. Programs include Emergency Repair, Paint Your Heart Out, Wheelchair Ramp, World Changers, Raise the Roof, Limited Repair and Reconstruction.

CONCLUSIONS/FINDINGS/RECOMMENDATIONS

The Internal Audit Office expresses appreciation to the management and personnel of the Community Development for their cooperation and assistance. As noted throughout the report, management has addressed many of the concerns. Based on our review, we believe management could enhance the efficiency and control environment by continuing to address and monitor the following:

- Organizing and reviewing the project files.
- Ensuring that appropriate inspections are passed and documented before partial and final payments are made to contractors.
- Complying with payment procedures to prevent unauthorized payments.
- Verifying the completeness and accuracy of contractor information by comparing information maintained by the City's Fair Share Office.
- Enhancing the scope of background checks on contractors.
- Reviewing contractor's for compliance with State registration requirements.
- Inquiring about investigations and convictions on the contractor's application.
- Documenting the explanation to homeowners of work to be performed.
- Performing surveys and documentation of discussions with participants.



1. Project Files Review

Criteria: To ensure that a filing system is reliable, supporting documentation and related correspondence should be filed in a systematic and orderly manner. This would help to ensure that all expenditures are properly approved, supported, and filed in a timely manner.

Condition: We reviewed the project files for 37 homeowners who participated in the Community Development Housing Programs. (**Auditor's Note:** *During the course of this audit, Community Development was in the process of addressing the organization and completeness of files.*) Our review of the project files revealed:

- ♦ There were incomplete or no checklists which made it difficult to determine if the files were complete. (**Auditor's Note:** *Documentation in the files indicated some of the Construction Checklists were not completed due to the inspectors leaving before they could complete the checklist.*) Also, some documents were not in the file although they were shown on the checklist as contained in the file.
- ♦ Files had not been reviewed to determine whether they were complete.
- ♦ Files were difficult to review since the files were not organized in accordance with the checklists (File Checklist, Neighborhood Revitalization Checklist, and the Construction File Checklist) in the file.
- ♦ There were extra copies of documents, blank documents, or unsigned documents in the files.
- ♦ The before and after pictures were not labeled to determine what the picture was showing. There were also some pictures that were not dated.
- ♦ Some files lacked after pictures or had after pictures of only some of the work that was done.

Specifically, the following exceptions were noted for the **52** projects reviewed:

- ♦ 15 - No after photos.
- ♦ 13 - No Certificate of Completion.
- ♦ 17 - No "File Checklists" or incomplete checklists.
- ♦ 35 - Partially completed or incomplete "Construction Checklists".
- ♦ 14 - Missing documents.
- ♦ 18 - Certificates of completions had not been signed off certifying approval for payment.

Effect:

- ♦ Work that has been completed was not adequately documented.
- ♦ Adequate support not maintained or processed for payments.
- ♦ Inefficiency in reviewing and producing necessary documents.



Cause: Management within the Housing unit was not reviewing files for completeness.

Recommendation: We recommend the appropriate personnel:

- ♦ Organize files to coincide with file checklists (Construction, Neighborhood Revitalization and File Checklist) to provide for easier review of files in determining whether the file is complete.
- ♦ Ensure checklists are completed, meaning that yes, no, or n/a is checked and any notes or comments are included on the checklist.
- ♦ Ensure when checklists are reviewed that they are signed and dated.
- ♦ Discard any unnecessary, extra, or blank documents from files.
- ♦ Ensure all completed (signed, dated, approved etc.) documents are maintained in file.
- ♦ Ensure labeled and dated before and after pictures of all the work are included in the file and cross referenced to the work specifications.

Auditor's Note: *Community Development management has addressed this in the newly drafted policies and procedures dated September 2009.*

Management Plan of Action: One person has been designated as the file maintenance coordinator. It is their primary duty to ensure that all applicant files are properly maintained in accordance with the housing standard operating policy and procedures and the governing regulations. We are now using 6-pronged multi-sectioned applicant files. Each section has a distinct category and set of documents. Management and any appropriate person of interest should be able to review files in a sensible and standard manner with the information clearly arranged. This makes review of the file clearly organized. A file checklist is in each file to ensure that all relevant documentation is included. Additionally, we are ensuring that the checklist is more comprehensive and that a response is recorded for each item identified on the checklist. Duplicate and blank documents and irrelevant pictures have been removed from the files, and pictures will be dated and labeled as "before" and "after". The unit manager will conduct a frequent review of the files, and the bureau chief or his/her designee will approve all files upon close out. Each will verify their review of the files.

Timetable: COMPLETE

2. Coordination of Inspections

Criteria: To determine compliance with housing standards and building codes, the rehabilitation projects require inspections by Community Development Housing Inspectors and by the Department of Operational Services, Permits and

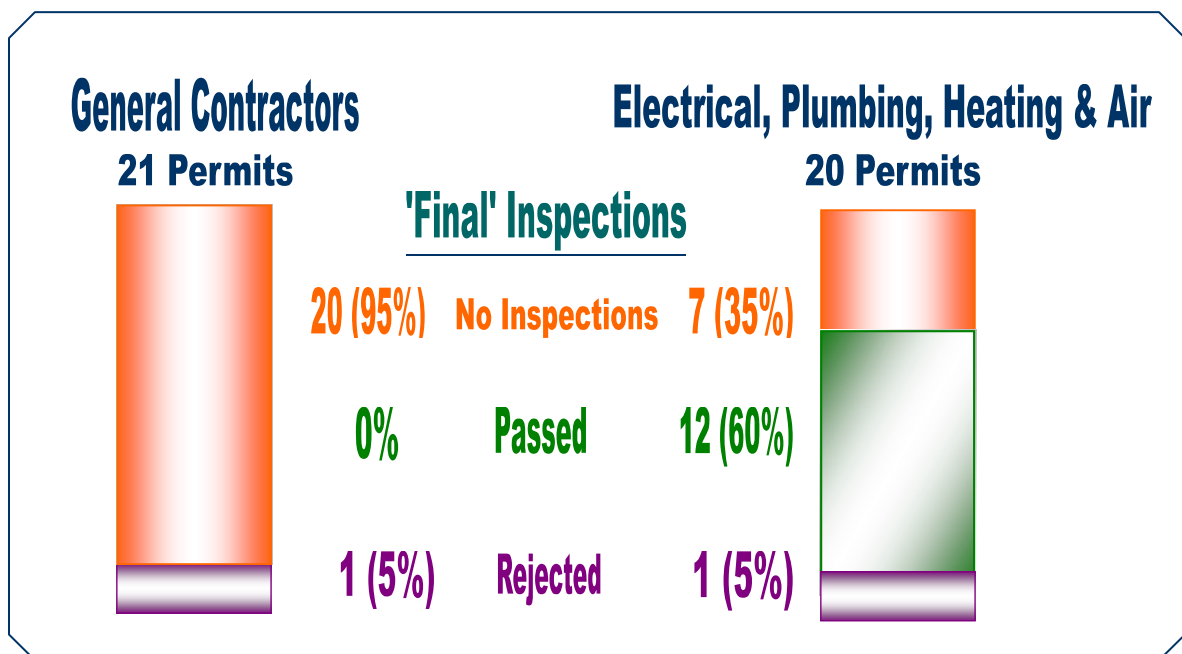


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Inspections Division. Before payment is made for any work performed, the work should have passed all inspections.

Condition: During our review of the projects for the 37 residences, we noted that there was no assurance that all the work performed by the housing contractors had either passed inspections or had been inspected.

This is strongly evidenced by both the lack of documentation of inspections by Community Development Housing Inspectors as described in Finding #1, "Project Files Review" and by the lack of permits and inspections requested by the contractor from the Department of Operational Services, Permits and Inspections Division for compliance to building codes (to include electrical, plumbing, heating & air). Inadequate inspections are indicated in the chart below for both general contractors and electrical, plumbing, heating & air contractors.



Auditor's Note: During the course of the audit, Community Development addressed the requirement for proof of inspections in the policy and procedures manual.

Additionally, not all of the projects had been properly permitted. We believe, based on the project specifications, that at least 10 of the unpermitted projects should have been permitted and inspected. These projects included work such as replacing roofs, repairing foundations, replacing a hot water heater, and replacing patio support posts.



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Auditor's Note: *For our tests performed, we utilized the inspections performed instead of the permit status of 'finaled' that would indicate that work had passed all required inspections. We noted discrepancies within the Permits and Inspections computer system between the status of a permit and whether any inspections had been performed:*

- ♦ *9 permits had been 'finaled' that indicates that the work had passed all required inspections, but those permits did not have any inspections.*
- ♦ *3 permits had passed inspections but their status had not been 'finaled'.*

Please note that Permits and Inspections management will implement procedures so that permits will be appropriately classified as 'finaled' or 'expired' (See AA2010-02 "Permit Status").

Effect:

- ♦ Residents living in unhealthy and unsafe environments.
- ♦ Payments were made without appropriate inspections.

Cause:

- ♦ Contractors were not applying for permits.
- ♦ Contractors were not requesting inspections.
- ♦ There was no follow-up to determine whether appropriate permits were requested and whether work had passed inspections.

Recommendation: We recommend that management:

- a) Define the steps in a project that require inspections and define what types of inspections are required. This should include those inspections that are required to be performed by Permits and Inspections and those inspections that are to be performed by Housing Inspectors.
- b) Require that before any partial or final payments are made for work performed, that any required inspections have been passed for that work performed:
 - ♦ Require evidence of Housing inspections by an inspection log with appropriate pictures and signatures attesting to inspections performed and passed.
 - ♦ Require evidence of Permits and Inspections approval by a copy of the permit with appropriate signatures attesting to inspections performed and passed.
 - ♦ Have periodic reviews performed by higher levels of management to determine that appropriate inspections and review have been performed and passed.

Management Plan of Action: During the period of review, we verified that there were over 200 permits pulled. However, we acknowledge that some were omitted or mis-categorized. We are working very close with Permits and Inspections to



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ensure to the greatest extent feasible that this does not occur again. In addition, a copy of the permit must accompany the payout request. We are in the process of hiring a Housing Field Supervisor to better communicate and coordinate activities with both divisions.

Housing inspectors must perform progress inspections during the term of the contract. When a pay request is submitted, the inspector must identify all work that has been completed and the percentage of what is completed, prior to any approval for payment. The inspector must also qualify the workmanship of work performed as to whether it is performed per the specification and performance manual. The contractor is responsible for pulling the correct permit applicable to the trades identified in the project. He supplies Permits and Inspections with a copy of the contract and work specification at the time he requests the permit. Permits inspectors are contacted by the contractor to perform permit inspections; upon this inspection, they must sign off on the permit card (green card) that the work conforms to code standards.

We have also added and advertised a position for Field Supervisor, who will follow up on the inspectors and address and mediate complaints and grievances between homeowner and contractors.

Timetable: The Field Supervisor will be hired by August 31, 2010

3. Unauthorized Expenses

Criteria: The neighborhood revitalization program requires contractors to have the following insurance and bonding:

- ♦ Minimum Commercial General Liability of \$1,000,000 per occurrence or \$2,000,000 aggregate.
- ♦ Minimum Auto Liability of \$500,000 and a minimum \$500,000 Worker's Compensation
- ♦ Bonding is required on any contract exceeding \$20,000, or on any contract which causes the aggregate amount to exceed \$20,000. The contract which causes the aggregate amount to exceed \$20,000 will be bonded for the full amount of said contract.

Community Development procedures allow an advance up to 10% for a payment and performance bond on behalf of the contractor in extenuating circumstances. The advancement can only be approved by the Director of Community Development.

Condition: Our review of a reconstruction project revealed that Community Development paid the following unauthorized expenses that should have been paid by the contractor:



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(1) New Home Construction and Builders Risk Insurance Policy for \$5,629.79.

(2) Performance and Payment Bond Premium for \$2,925.00.

Effect: Unauthorized expenses were paid.

Cause: The expense for \$5,629.79 was approved by another authorized department personnel in the absence of the Director. The authorized personnel was probably unaware that the expense should not have been approved.

The proper process was not followed in making the performance and payment bond payment. A purchase order was processed by department personnel to pay the \$2,925.00. However, a contract amendment should have been prepared for approval by the Director of Community Development to reduce the contract by the amount of the expense before the payment was made.

Auditor's Note: *According to the Director, the expense for \$2,925 would not have been approved by her since it would not have been an extenuating circumstance or a distress to the contractor.*

Recommendation: We recommend that department personnel comply with authorization procedures to prevent future unauthorized payments.

Management Plan of Action: This matter has been referred to the City Attorney's Office for further investigation. Staff has been reprimanded as evidenced by Attachment II. The bureau chief at the time of the infractions is no longer employed by the City of Shreveport. The contractor in question has been suspended indefinitely from the program. Enclosed is the advance policy for the department evidenced as Attachment III.

Timetable: COMPLETE

4. Contractor Applications, Registration, and Background Checks

Criteria: To help ensure that a contractor is qualified, suitable, and has the capacity to perform rehabilitative work, documentation should be complete, accurate, and sufficient and updated annually.

Condition: During our review of the contractor's files we noted the following:

- ♦ We compared the information for contractors who are certified by both Community Development and Fair Share. The applications of both departments have at least 11 similar items: licenses/certificates, owners /stockholders, type of business, age of business, financial statements, last



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three customers, major equipment, number of employees, nature of work, bank information and suppliers. There was some conflicting information for two of the contractors. Conflicting information included number of years in business; major equipment leased or owned; owners/stockholders; and nature of work.

- ♦ Community Development reviews contractors that perform residential construction work over \$75,000 for proper licensing with the Louisiana State Licensing Board for Contractors. However, reviews for registration for home improvement work between \$7,500 and not exceeding \$75,000 were not performed. We determined that three contractors had not properly registered.
- ♦ Early in 2009, Community Development had instituted background checks for new contractors. However, background checks had not been performed on existing contractors. The background checks are limited to only felonies in Caddo Parish.

Additionally, we noted that the Neighborhood Revitalization Program Contractor's Application could be enhanced by adding an inquiry regarding felonies/misdemeanors and investigations from the Louisiana State Licensing Board for Contractor's.

Effect:

- ♦ Possible incomplete or inaccurate information.
- ♦ Contractors had violated State law by not being properly registered.
- ♦ Someone with criminal convictions could be contracted by the City to perform duties that require interaction with the public.

Cause:

- ♦ No system developed to share information between departments regarding the contractor applications.
- ♦ No reviews to determine if contractors were in compliance with registration requirement for home improvement work between \$7,500 and not exceeding \$75,000.
- ♦ Caddo Parish background checks were performed only on new applicants.

Recommendation: Community Development should consider:

- a) Verifying information or researching additional information provided by contractors through the Fair Share Office.
- b) Reviewing contractors for compliance with State registration requirements. Management should review periodically during the year to ensure that valid State contractor's registrations have expiration dates extending beyond the



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anticipated date of completion of construction projects. This process should also extend to the State contractor's licenses.

- c) Increasing the scope of the background checks.
 - ♦ Coordinate with the City Attorney's Office to determine contractual language necessary to perform a broader background check.
 - ♦ Consider performing background checks annually for all contractors.
- d) Requiring existing and new contractors to disclose felonies, misdemeanors, and investigations. This could be accomplished by adding these questions on the Community Development Neighborhood Revitalization Contractor's Application and requesting a disclosure from existing contractors:
 - ♦ A question inquiring about felonies and misdemeanors. For example: Have you or principals in your business been convicted of a felony or a misdemeanor other than violation of traffic laws? If yes, please explain.
 - ♦ A question inquiring about any investigations from the Louisiana State Licensing Board for Contractor's. For example: Are you being investigated or have you been investigated by Louisiana State Contractor's Board? If yes, please explain.

Management Plan of Action: A person or business must have a certificate and residential license by the State of Louisiana to participate in any of our housing programs. Currently contractor license stature is verified annually to confirm licensing and renewal of licenses. The staff will check periodically to verify that a contractor is in good standing with State. All bids and contracts must include the contractor's license number.

The contractor application has been revised to include language referencing felonies and investigations. We currently check with the appropriate law enforcement authority to determine if there are any felony violations. The general contractor must sign a criminal conviction certification and a HUD's debarment and suspension certification as evidenced by Attachment I. In addition to the criminal background check, HUD's debarment list is checked on each contractor.

Timetable: COMPLETE

5. Documentation of Scope of Work Explained to Homeowner

Criteria: Work specifications should be explained to the homeowners to ensure that the homeowner understands and is aware of the work that is to be done on the property.

Condition: For work done in 2008 and 2009, per review of complaints received from participants in the Community Development Housing Programs, homeowners did not fully understand what work was to be done on their home. We noted that



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some participants complained that the city should have performed work other than what they were eligible to receive.

For example: some complained about repairs that were needed inside their home but, they actually participated in the "Paint Your Heart Out" program which is only for painting and repairs to the exterior of the home. Others may have participated in the "Raise the Roof" program but, thought that work was scheduled to be performed to the inside of their home as well, when actually they were only replacing the roof. Those who participated in the "Limited Repair" program had complaints about areas of the home that needed repair or replacement but was not done. But these areas were not included in the work specification.

During our review, of the project files we couldn't determine if the work specifications had been explained to the homeowners. Management has asserted that walkthroughs were performed with homeowners before construction; however, no specific documentation of this activity was included in the files.

Auditor's Note: *Policies and procedures drafted in September 2009 show that management has identified a procedure where the homeowner will be required to initial each item on the work write up to indicate their understanding and acknowledgement of the type of work that will be performed at their residence. As work is completed and the contractor presents a payout request, the inspector will also provide to the homeowner a picture of the completed work along with the payout request for them to sign.*

Effect:

- ♦ Frustrated and unsatisfied participants.
- ♦ Misunderstandings between homeowner, contractor, and inspector.

Cause: Project files did not contain documentation to evidence that work specifications had been explained to the homeowner.

Recommendation: Ensure that project files include documentation that will provide evidence that work specifications have been explained to homeowners. Such documentation could include a signed and dated statement that says the work specifications and proposed schedule was explained and provided to the homeowner (e.g., can be included as part of the work specification). By doing this, Community Development would be able to document the homeowner's consent to the scope and schedule of the project. The homeowner's signature could also provide an independent verification of rehabilitation fund expenditures and provide an element of cost control and accountability. Also, include this form/statement on the Construction File Checklist.



Auditor's Note: *During the course of this audit, management has addressed this in the newly drafted Policies and procedures dated September 2009.*

Management Plan of Action: A preconstruction walk-through is conducted on each project with the homeowner, contractor and inspector present. In the past, homeowners initialed each specification item to confirm that the item was discussed with them. We have implemented a policy that requires minutes to be documented during each construction conference; and signed by the homeowner, contractor and inspector. We have also developed a homeowner's manual that explains the program and details the homeowner's rights (Attachment IV). A representative of the family is encouraged to participate in the preconstruction walk through and every aspect of the project.

Timetable: COMPLETE

6. Customer Satisfaction

Background: The "Neighborhood Revitalization Programs" are categorized into two types:

- ♦ "Rehabilitation Assistance" where Community Development contracts for home repairs and construction. Programs include Emergency Repair, Paint Your Heart Out, Wheelchair Ramp, World Changers, Raise the Roof, Limited Repair and Reconstruction.
- ♦ "Homeownership Assistance" where Community Development provides mortgage assistance and homebuyer assistance. No home repairs or home construction is provided under this program.

Criteria: Participant feedback provides insight to areas that could be improved.

Condition: We mailed questionnaires to the participants of Department of Community Development's "Neighborhood Revitalization Programs" during the years 2008 and 2009.

We asked the participants whether they were satisfied or unsatisfied with the service that was received from Community Development programs that they participated. As illustrated in the chart below, 46% of the "Rehabilitation Assistance" respondents were not satisfied. (Please note that the "Homeownership Assistance" respondents had no concerns about the assistance received from the Community Development program.)



Rehabilitation Assistance Years 2008 & 2009

171 responded
225 participants
(76% responded)

46% (78)
not satisfied

54% (93)
satisfied

Programs Include:
Emergency Repair
Wheelchair Ramp
World Changers
Raise the Roof
Limited Repair
Reconstruction
Paint Your Heart Out

Effect:

- ♦ Participants living in unsafe and unhealthy environments.
- ♦ Participants unable to voice their concerns and comments.
- ♦ Contractors had not completed work that they were paid to perform.

Cause: There had been no formal procedure for participants to voice their concerns.

Recommendation: We recommend that management continue to support the complaint call system that was implemented as a result of concerns. Additionally, management should consider implementing interviews and documented surveys with participants during and after the project completion to gauge the level of satisfaction with the work performed.

Auditor's Note: Procedures implemented by management included a "Homeowner Job Evaluation" to be completed by the homeowners after completion of the rehabilitation work has been performed.

Management Plan of Action: We have implemented a complaint log that documents the date and nature of complaints and concerns by the homeowner. A



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staff person has been dedicated to maintaining the complaint log and assessing the nature of the complaint. The field supervisor will ensure that each complaint is properly investigated. Also, a job evaluation survey has been revised to be completed by the homeowner after the completion of work (Attachment V). The department's website will also have mechanisms for complaints and a customer service survey.

Timetable: COMPLETE

Prepared by:

Barbara Pfister, CIA, CFE, CISA
Staff Auditor

Tamika Ford
Staff Auditor

Approved by:

Leanis L. Graham, CPA, CIA
City Internal Auditor

BP:lp

c: Mayor
CAO
City Council
Clerk of Council
City Attorney
External Auditor
Department of Community Development



CRIMINAL CONVICTION CERTIFICATION

The department of Community Development is required to conduct criminal record checks for all contractors. The department can deny participation in any of its programs based upon an individual's conviction.

Have you ever been convicted or pled no contest to a felony within the last ten years?
Circle one: YES or NO

IF YOU ANSWERED YES, PLEASE ANSWER THE FOLLOWING QUESTIONS:

Supply the following information:

- What was the specific crime(s)?

- What was the date of the conviction(s)?

- Where (city and state) did the crime(s) occur?

- In what court(s) were you convicted?

- Provide any other facts you consider important relative to the conviction(s) by attaching additional page(s) if needed.

I certify that my answers are complete and accurate to the best of my knowledge. I understand that failure to provide this information or concealment or misrepresentation of information may result in denial of participation in any program administered by the department of Community Development.

Furthermore, I understand that if I am convicted of a felony or misdemeanor at ANY time during my contract, I am obligated to notify the department of the conviction. Failure to do so will result in removal or suspension from participating in the program.

Printed Name Date

Signature

Community Development: Criminal Conviction Certification

Date

form CDADM- 7



City of Shreveport
Department of Community Development
Bureau of Administration

**TITLE 49, CODE OF FEDERAL REGULATIONS, PART 29 DEBARMENT AND
SUSPENSION CERTIFICATION**

- 1) All persons or firms, including sub consultants, must complete this certification and certify, under penalty of perjury, that, except as noted below, he / she or any person associated therewith in the capacity of owner, partner, director, officer, or manager:
 - a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;
 - b) Have not, within the three (3) year period preceding this certification, been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) transaction or contract under a public transaction, violation of federal or state antitrust statutes, or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
 - c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses listed in subparagraph (1)(b) of this certification; and
 - d) Have not, within the three (3) year period preceding this certification, had one or more public transactions (Federal, State, and Local) terminated for cause or default.
- 2) If such persons or firms later become aware of any information contradicting the statements of paragraph (1), they will promptly provide that information to the Department of Community Development of the City of Shreveport.

If there are any exceptions to this certification, insert the exceptions in the following space.

Exceptions will not necessarily result in denial of award, but will be considered in determining bidder responsibility. For any exception noted above, indicate below to whom it applies, initiating agency, and dates of actions.

Name of Firm

Signature (original signature required)

Date



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Attachment II
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INTER-OFFICE MEMORANDUM
City of Shreveport

DEPARTMENT OF COMMUNITY DEVELOPMENT

Phone: 318-673-5900

Fax: 318-673-5903

DATE: Dec 29, 2009

To: Herman Vital, Assistant Director
Community Development

Fred Thomas, Bureau Chief
Administration

Mortimer Harris, Management Assistant
Housing & Business Development

Re: Advance Payments to Contractors/Sub recipients:

Attached is the Advanced Payment policy. The policy should be implemented immediately throughout your respective Bureaus.

The policy change resulted from the mishandling of several payment requests in the Housing Bureau. Payments totaling \$8,554.79 were made on behalf of Regenesi Construction in conjunction with a CDBG-funded reconstruction project located at 4035 Rose Street. (Two payments were made to Kent Kent & Tingle for general liability insurance for \$5,254.79 and builder's risk insurance for \$375.00 on 08/03/09.) An additional payment was made for a performance and payment bond premium for \$2,925.00 on 06/04/09. The Housing Bureau clearly exceeded its power to authorize payment. In one instance, the Administration Bureau did not get the appropriate approval to process the document for payment.

Unquestionably, this is a very serious matter. These actions could have resulted in excessive payments to the contractor. This was plainly an abuse of authority and violation of the department's standard accounting practices. Therefore, this letter will serve as formal written notice of such violation. I have concluded that if further violations occur, it will result in disciplinary actions.

If you have any questions or need clarification, please contact me. I sincerely hope that this will not occur again. However, if necessary, we will take any and all actions necessary to protect the integrity of the federal, state and local funds.

Sincerely,

A handwritten signature in cursive script that reads "Bonnie Moore".

Bonnie Moore,
Director



CITY OF SHREVEPORT

P.O. BOX 31109 SHREVEPORT, LA 71130 • 505 TRAVIS STREET SHREVEPORT, LA 71101
Website: www.shreveportla.gov

DEPARTMENT OF COMMUNITY DEVELOPMENT POLICY INSTRUCTION

TITLE: Advance Payments.

Purpose:

To establish departmental guidelines that will be utilized in approving any request for advance payments for any program activity or project administered by the department.

General Provision

Generally, goods and services are paid for after receipt unless it is a part of a structured program such as the Neighborhood Investment Program, City or State Bonding Program, etc. It is the department's practice not to pay for goods or services until they have been received or the services have been rendered satisfactorily. Advance payments are to be avoided whenever possible. However, on occasion, it may be necessary to provide an advance payment.

The department may incur costs which may be charged to a particular funding stream upon an award provided the costs are in compliance with governmental rules and regulations. The advance payment will not exceed the recipient's or contractor's immediate cash needs or no more than 20% of the contract amount. The overall advantage must be to the city.

Procedure:

A. A "Memo to File" must be provided by the project manager explaining the need for the request.

B. A detailed explanation of the request must be made in writing by the requesting agency, contractor, sub grantee, or individual with all supporting documentation for consideration of an advance payment. Companies or organizations to which an advanced payment is to be issued must provide an invoice (or written confirmation of total cost) for the full amount of the advance payment prior to the issuance of the advance payment.

C. The costs identified in the request must be reasonable, allowable, and allocable.



Continued: pg. 2

D. The contract amount shall be reduced by the amount of the advance. In the case where a purchase order is used, the project manager and accounting specialist shall ensure that the contract and all related contract documents are adjusted to document the advance.

D. Any request for advance payment pertaining to program activities or projects shall be reviewed by the project manager or the first line supervisor. The project manager or first line supervisor will forward the request with any comments to the Department Director, including a detail explanation why an advance is necessary.

E. A copy of the approved payment shall be maintained with the fiscal unit and in the central file in the manner and for the time period required by the Department's records retention schedule.

Approval

The Department Director shall be authorized to approve any advance payment(s) that comply with this written policy upon a determination that the advance payment is in the public interest or is necessary to advance the project.

Approved: Bonnie Moore
Bonnie Moore, Director

Date: 12-29-09



IAR 130110-07
MARCH 31, 2010

Attachment IV
Page 1 of 19



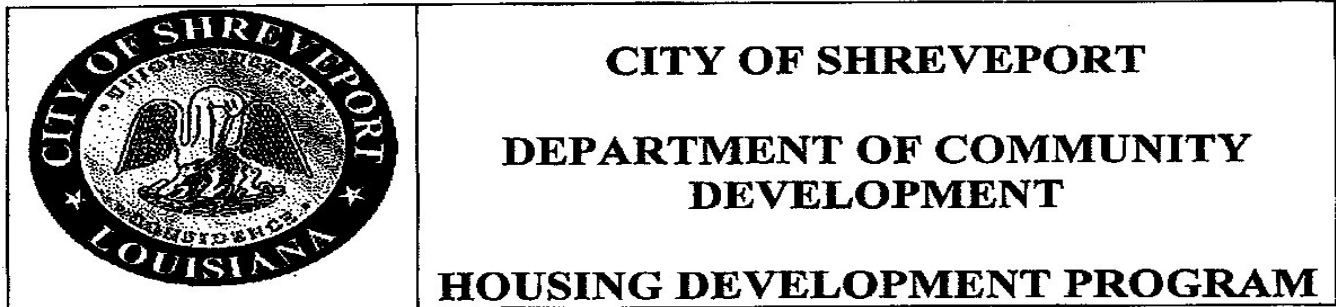
CITY OF SHREVEPORT
DEPARTMENT OF COMMUNITY
DEVELOPMENT
HOUSING REHABILITATION
PROGRAM

Owner's Manual





August 3, 2009



Home is more than a house. Home is where you are making memories for a lifetime. It is also an asset, an asset whose value you want to protect. The City of Shreveport is committed to creating a better quality of life for its residents and that includes helping them maintain safe, decent homes. Working through the Department of Community Development, the City wants to help you protect what is probably your most valuable tangible asset, your home.

As a house ages, it can develop aches and pains, which, if allowed to continue untreated, may cause it to become unsafe. If you qualify, the Housing Rehabilitation Program may be able to help you bring your home back into a safe, sanitary and decent condition.

This manual explains the process and should answer most of your questions about the program and how to get involved. If you have more questions or want more information about the Housing Rehabilitation Program, call the City of Shreveport's Department of Community Development at (318) 673-7503, or stop by our office in the City Hall Annex Building located at 1237 Murphy Street, Room 300.



What can the Department of Community Development's Housing Rehabilitation Program do for me?

Rehabilitation work or reconstruction for eligible owner-occupied, single-family homes should correct deficiencies and return them to a safe, sound and sanitary condition. Depending on the condition of your home, the Housing Rehabilitation Program may be able to help you repair or reconstruct your home. If your home is repaired, the City would assist you with a five-year forgivable loan/grant. If your home is reconstructed, the forgivable loan will be for 15 years. Reconstructions are only done in qualified census tracts and are approved as a last resort.

Am I eligible for the program?

You and your household must qualify financially. Because the funding for the program comes from state and federal sources, we use the income definitions of HUD's Section 8 program to determine the annual gross income of your household. Your household's annual gross income must fall at or below 80 percent of the area's median income. You'll find the income limits on the final page of the Owner's Manual.

If your household income qualifies, there are several other eligibility requirements:

- You must be a U.S. citizens or a legal resident alien.
- You must have resided in your home for at least two years prior to your application.
- You may not have received assistance from the Housing Rehabilitation Program within the last 15



years. If a previous owner of your home received assistance within the last 15 years, your home is not eligible.

- If you have already received \$35,000 or more in assistance, you will not be eligible for additional housing rehabilitation assistance. If you received less than \$35,000, you will be eligible to receive the difference between what has already been spent and \$35,000.
- If you purchased your home with assistance from the City of Shreveport's Community Development's Affordable Housing Assistance Program, you must have completed the compliance period for that loan.
- You must be current with your mortgage payments and all applicable property taxes. You also must have homeowner's insurance covering structural replacement and maintain it throughout the grant compliance period.
- You must acknowledge that resources (family/friends) are readily available if temporary relocation is necessary during the rehabilitation construction period.
- You must be prepared to keep up your home by doing ongoing maintenance and repairs, and addressing safety hazards and health/cleanliness issues.

What is a forgivable loan/grant?

That means we will loan or grant you the money to cover your home's rehabilitation or reconstruction, and if you continue living in your home for the life of the loan/grant, you will not have to



repay the loan. If you sell, rent or vacate your home during the life of the compliance period, the balance of the loan/grant must be repaid to the city.

To protect its investment in your property, the City will file a lien on your property with the Caddo Parish Register of Deeds. The lien becomes part of your Deed of Trust, but the lien will be removed at the end of the compliance period or if you repay any balance still owed.

What is a lien?

A lien is security against a debt. Your mortgage holder has a lien on your property to protect its interest. Our lien is like a second mortgage.

How long is the life of the loan?

That depends. If we rehabilitate your home, the loan/grant is for five years. If we reconstruct your home, the forgivable loan is for 15 years.

Part of the loan/grant is forgiven for each year you live in your home after we complete our project. A five year rehabilitation loan/grant is reduced by 20 percent for each full year you live in your home. A 15-year reconstruction forgivable loan is reduced at the rate of 6.66 percent per year.

What kinds of repairs can the Housing Rehabilitation Program help me with?

If you qualify financially, you will be asked to invite a Community Development Certified Housing Inspector to visit your home. The inspector will be looking for situations related to unsafe conditions. For the purposes of our program, unsafe conditions generally



would be related to your roof, electrical system, plumbing, heating and the structural soundness of our home. The inspector may also decide a situation in your home could become a problem due to age, deterioration, wear, or normal usage within the life of the grant. Costs to correct these potential violations may be eligible. General maintenance and upkeep are not eligible for rehabilitation. If your home has care of premises violations, we will not be able to assist you until you have removed the care of premises violations.

What isn't eligible?

Because our funds are limited, because we have more households needing assistance than we have funding to handle and because the federal and state agencies have their own rules for what is and isn't eligible, we have to limit what we can fix in your home. The purpose of our program is to rehabilitate, *not remodel*, your home.

A loan/grant from the Housing Rehabilitation Program may not be used for:

- Renovation of detached accessory buildings;
- Appliances not required by code standards;
- Materials, fixtures, equipment, or landscaping that exceeds what is customarily used in Community Development for properties of the same general type as your home.
- General maintenance and homeowner repair.

What if I don't need \$35,000 in repairs?

If your home only needs, as an example, \$10,000 in repairs, you will not be asked to commit to more than \$10,000 in repairs.



But if it looks like the repairs to my home may cost more than the \$35,000 cap?

Because of the \$35,000 limit per project, we may not be able to correct all the problems found during the inspection. If that is the case, we will meet with you to determine the most pressing problems and decide what can be done within the budget allowed for the project.

Sometimes rehabilitation is not feasible and reconstruction is the more cost-effective use of program funds. The \$35,000 cap is waived for housing reconstruction projects.

Who decides if my home is eligible for reconstruction?

The intent of a reconstruction activity is to assist homeowners who might not otherwise be helped due to the prohibitive cost of rehabilitating their existing home. The City may decide a replacement home is the most cost-effective solution to your housing problem. When reconstruction is recommended, we will submit documentation to the City of Shreveport's Community Development Director for review. If the Director concurs with the Housing Bureau's recommendation, written permission to proceed will be provided.

A replacement home does not necessarily have to match the existing home in terms of square footage, number of bedrooms and bathrooms, or other design/amenity considerations, but it will provide all permanent residents in the home with safe, decent, and sanitary housing.



If a replacement home is recommended and approved, you may decline the offer. If you do decline reconstruction, we will not be able to help you with rehabilitation assistance.

What happens if something shows up during the construction phase?

We'd be surprised if something doesn't show up. We do our best to anticipate what may be hidden behind a wall or under a floor, but our inspectors don't have x-ray vision. If a change needs to be made in the scope of the project, the change will be explained to you by the contractor and a representative of the Community Development Department. No changes in the project or the price of the project will be made unless you agree in writing.

What happens if I have a problem with something that has been repaired after the rehabilitation project has been completed?

The rehabilitation contract requires the contractor to provide a one-year warranty on the rehabilitation work. If there's a problem, contact the Community Development Department – Housing Bureau and we will help you get our problems resolved.

I like what I'm hearing and I think I qualify financially. What do I do next?

If you haven't already done so, complete and return the Request for Services Application you received with this Owner's Manual. If, based on this information, our office agrees that your household may qualify for the Housing Rehabilitation Program, we will notify you by mail and an inspector will be assigned to inspect your home.



What's in the application package?

First, you will find a list of documents to be submitted for qualifying. The application asks for information on you and all permanent members of your household. The application will ask for information about your income, your assets, your employment, your citizenship status and your home. Your signature on some of the forms in the packet authorizes our office to request verification of information required for the application. We will not ask you for any information that isn't necessary to comply with the policies and procedures of our program and applicable state and federal requirements governing our program.

Also in the packet is a copy of the pamphlet *Protect Your Family from Lead in Your Home*. If your home was built before 1978, there is a possibility that lead-based paint was used. Lead from paint, chips and dust can pose serious health hazards if not taken care of properly. Federal law requires us to provide information about lead hazards before we can help you with rehabilitating your home. We will ask for your signature twice on the application form. One certifies you have received a copy of the pamphlet *Protect Your Family from Lead in Your Home*.

When you return the application and the Request for Inspection, we will arrange for the preliminary inspection of your home.

My application is complete. What happens next?

You will be contacted to set up an appointment to attend the rehabilitation counseling seminars.



Is that like going to school?

Not exactly. There are three sessions in the program. The counselor will work with you to fit the sessions into your schedule. Among the topics you'll cover are how to handle simple home maintenance issues, how to save money through energy conservation, and budgeting. You need to plan on completing the seminars before we sign the contracts for your rehab project.

Do you have a waiting list for getting my project started?

Yes, we do. Again, our program funds are limited and the requests for rehabilitation assistance exceed our ability to fund all of them. Your name will go on the list when your application is complete. Where your name goes on the list will be determined based on the information in your application. Applications are processed on a first come, first served basis, and are subject to funding availability.

Another factor which limits the number of projects we can do at one time is contractor availability. Once we begin your project, we want to be sure it's completed in a timely fashion. That won't happen if we overstretch our contractors.

If I complete my application and qualify for the Housing Rehabilitation Program, will my name automatically go on the waiting list?

No. Because our funds are limited, we are limited in the number of homeowners we can help in any given year. The waiting list will be closed when the estimated costs for rehabilitation or reconstruction for approved applicants exceed 115 percent of that



year's funding allocation. No new applications will be accepted until funding is again available.

How does the waiting list work?

If you qualify for the Housing Rehabilitation Program, you will be assigned to a waiting list based on financial need, the household with the greatest need first, the next household second and so on until funds allocated for the rehabilitation program are expended. We use a priority ranking system developed and approved by The Department of Community Development. The system includes factors for varying prioritized repairs. You can view the priority ranking system at the Department of Community Development office.

Should households have identical repair needs as established by the priority ranking system, condition of the dwelling structure will determine priority. Dwelling condition will be determined after an inspection by the Department of Community Development Housing Bureau. The application with the earliest date of completion will have precedence. You will be notified when your name is next on the waiting list.

The waiting list is maintained by the Community Development Department and updated as applications are completed and households are ranked. Your name will be removed from the waiting list when your rehabilitation or reconstruction work begins, or if you ask us in writing to remove it. At least once a year, usually in December, the month before the beginning of our program year, any applicants on the waiting list will be contacted to verify they wish to remain on the list.



You've notified me that my home is next on your list. What happens next?

First, we'll thank you for being patient. Hang on to that patience. You'll need it in the next couple of months.

A number of things will be happening at what may seem to be the same time.

- If it's been more than six months since you completed your application, we'll ask you to verify your income again. We know it may be inconvenient, but it's a requirement passed along to us by our state and federal funding sources.
- Someone from our program will come to your home and make a detailed inspection based on the preliminary inspection. **ALWAYS ASK FOR IDENTIFICATION.** Based on the detailed inspection, our office will do a detailed work write-up. This is an important document because it will be the basis for bids from contractors.
- An inspector will come to your home to do a lead-based paint assessment. If your home was constructed before 1978, there is a possibility lead-based paint was used in your home. How the contractor handles your project will depend on the results of this assessment. If the assessment shows the presence of lead-based paint, clearance testing will be done at the completion of the rehabilitation project. You will be notified of testing results.
- The lead-based testing assessment is done. Now our office will update the work write-up if necessary and prepare cost estimates. You will be consulted as this is



done and asked to sign off on the final work write-up. Please remember it may not be possible to do all the work you want. Only work that corrects a condition which doesn't meet minimum standards, meets a code requirement or is an eligible activity can be funded, and we cannot exceed the program funding cap. **Remember, this is not a remodeling or maintenance program. We must address health and safety repairs, and Housing Quality Standards (HQS).**

- When all that is done, we will advertise for bids.
- We will meet with interested contractors at your home for a pre-bid conference to go over the scope of the project and give potential bidders an up-close look at what the successful bidder will be dealing with. You will be asked to verify your role in the project. For example, if furniture has to be moved during the project, who will do the moving? Where will it be stored during the work? Who will move it back after the work is done? **The contractor is not permitted to move your furniture. You must**
- Contractors submit their bids. The lowest bid generally will prevail. Before a bid is accepted, we confirm that the contractor is eligible to bid. This is for your protection. There must be a least three competitive bids for a contract to be awarded. If we don't receive three bids, we will ask you whether you want to re-bid the project as written or change the scope of the project and ask for new bids.



The bids have been received and a bid accepted. What next?

- You will now sign a written contract with the contractor. **DO NOT SIGN OFF ON THE WORK WRITE-UP IF YOU THINK EVERYTHING WAS NOT COVERED DURING THE INSPECTION.** The contract is between you and the contractor. The City is your technical advisor on the project. Since the City is lending/granting the money to pay the bill for the project, the Mayor and Council will have to sign off on the contract as well. Please be advised that no contractor is allowed to begin work on your home without a permit. **It is within your rights as the homeowner to ask to see the permit prior to any work being started. DO NOT ALLOW A CONTRACTOR TO BEGIN WORK ON YOUR HOME WITHOUT A PERMIT.** If you have doubts about whether the permit has been pulled, please call us at (318) 673-7503.

The contract is signed. How soon will work on my home begin?

That is up to you and the contractor to negotiate, but a contractor who can't begin work on your home within 15 working days of the contract's approval probably shouldn't have bid on your job.

Work has started on my home. Who makes sure it is being done correctly?

The City will conduct inspections throughout the construction phase. Compliance inspections will be made as often as necessary to be sure the work done meets all applicable codes. We'll also be checking to make sure the work meets the terms of your contract.



We're in the middle of the project and I have been told there is damage behind one of my walls. What do I do?

Situations which did not show up during the work write-up are not uncommon in the housing rehabilitation process, and they can change the scope of work, especially if the new problem must be resolved to correct the underlying code deficiency. In such a case, a change order may be initiated.

Change orders must be submitted in writing to the Department of Community Development. The City inspector assigned to the project, the homeowner, the contractor and the Community Development Director must sign off on the change order. Because a change order may alter the City's financial commitment to the project, all change orders must be approved by the City of Shreveport's Mayor and Council.

Change orders for a project may not exceed 10 percent of the original rehabilitation contract. A change order that would cause the cost of the project to exceed the \$35,000 cap must be approved by the Mayor and Council before work on the change order may proceed. The change order may change the scope of work on the original work specifications.

The contractor didn't show up today. What should I do?

Remember patience? There probably will be days when the contractor is only on the site for a couple of hours – or isn't there at all. This can happen for any number of reasons, for example, a part needed for the next step of the project is backordered or a subcontractor who is needed for the next step of your project won't



be available until tomorrow. Delays happen, but it is not unreasonable for the contractor to let you know when workers will or will not be on site working on your project. If you feel the contractor is not fulfilling the terms of the contract, contact the Department of Community Development, Housing Bureau.

The contractor says he has finished his work. What next?

Several more steps and we'll be through. The contractor, a representative of the Community Development Department and you will conduct a final inspection. In most cases, the "final inspection" is not final. If additional work, clean-up or corrections are needed, a written punch list will be developed during the final inspection. We will be working with you to make sure this work is done to your satisfaction. The work on this punch list has to be done before final payment is made. **DO NOT SIGN OFF ON THE FINAL INSPECTION IF YOU ARE NOT PLEASED WITH THE WORK PERFORMED.**

If lead-based paint was detected on the original assessment, the lead-based paint inspector will come back and do clearance testing when the punch list is complete. You will be notified in writing when the lead-based paint clearance is issued.

What do I do if I have a problem and I'm the only one who seems to want to get it settled?

Disputes between you and the contractor may arise from time to time during the life of the rehabilitation project. If there is a dispute and you and the contractor can't work it out to your satisfaction, you may file a grievance in writing with the Community Development Department Director who then will attempt to negotiate a settlement. If you're still not satisfied, the grievance procedure specified in the Housing Bureau's



Rehabilitation Program Policies and Procedures Manual should be followed. Copies of the manual are available for viewing at the Community Development Department (1237 Murphy Street, Room 300).

Financial eligibility for the City of Shreveport's Housing Rehabilitation Program is based on HUD's Section 8 income definition. In the City of Shreveport, the household's annual gross income may not exceed 80 percent of the median income in the Shreveport MSA. These numbers are determined by HUD and are subject to change annually. Below are the income limits currently in effect:

Family Size	Annual Income-80% AMI
1	<u>\$36,600.00</u>
2	<u>\$41,800.00</u>
3	<u>\$47,100.00</u>
4	<u>\$52,300.00</u>
5	<u>\$56,500.00</u>
6	<u>\$60,700.00</u>
7	<u>\$64,850.00</u>
8	<u>\$69,050.00</u>

While every attempt has been made to be sure the information in this manual reflects the approved policies and procedures of the City of Shreveport's Department of Community Development Housing Rehabilitation Program, statements in the Housing Rehabilitation Policies and Procedures Manual take precedence over statements in the Owner's Manual.



HOMEOWNER REMINDERS

- 1. DO NOT LET ANY CONTRACTOR START CONSTRUCTION ON YOUR HOUSE WITHOUT A PERMIT. IF YOU HAVE ANY DOUBTS, PLEASE CALL (318) 673-7503.**
- 2. ALWAYS ASK FOR IDENTIFICATION WHEN SOMEONE SHOWS UP TO DO WORK ON YOUR HOUSE. ASK THEM QUESTIONS ABOUT WHAT THEY ARE SUPPOSE TO BE DOING AT YOUR HOME. BEWARE OF STRANGERS.**
- 3. DO NOT SIGN OFF ON THE WORK WRITE- UP IF YOU DO NOT THINK ALL WORK HAS BEEN COVERED DURING THE INSPECTION.**
- 4. DO NOT SIGN OFF ON THE FINAL COMPLETION INSPECTION IF YOU ARE NOT SATISFIED WITH THE WORK PERFORMED.**
- 5. IF IN DOUBT, ASK QUESTIONS ABOUT ANYTHING YOU DO NOT UNDERSTAND.**
- 6. YOU ARE ENCOURAGED TO HAVE A FAMILY MEMBER OR TRUSTED FRIEND AVAILABLE WHEN SIGNING ANY DOCUMENTS.**
- 7. TO REPORT ANY DISRECTFUL CONDUCT OR COMPLAINTS ABOUT THE WORK, PLEASE CALL (318)673-7556.**



STAFF CONTACTS

**City of Shreveport
Department of Community Development
P.O. Box 31109
Shreveport, LA 71130-1109**

**Mrs. Bonnie Moore, Director
(318) 673-5900**

**Mr. Herman Vital, Assistant Director
(318) 673-7500**

**Ms. Valerie Ervin, Housing Unit Manager
(318) 673-7503**

**Mr. Mortimer Harris, Management Assistant
(318) 673-7503**

**Ms. Marcia Nelson, Management Assistant
(318) 673-7503**

**Field Inspectors
(318) 673-7503**



HOMEOWNER JOB EVALUATION

CONTRACTOR: _____

HOMEOWNER: _____

ADDRESS: _____

Please check either "Yes," "No," or "N/A" in response to the question asked. If your response is "No," please explain circumstances in comment section. If question is not applicable.

1. Was the house occupied during rehab/construction?
☐ Yes ☐ No ☐ N/A
2. Was the work specification made clear to you before the start of the work?
☐ Yes ☐ No ☐ N/A
3. Did job progress without numerous delays?
☐ Yes ☐ No ☐ N/A
4. Did job progress without leaving house torn up for more than five days unattended?
☐ Yes ☐ No ☐ N/A
5. Was bathroom accessible within two days of tearing out?
☐ Yes ☐ No ☐ N/A
6. Was kitchen accessible within two days of tearing out?
☐ Yes ☐ No ☐ N/A
7. Did Contractor maintain good professional customer relations?
☐ Yes ☐ No ☐ N/A
8. Were construction crew members courteous and professional?
☐ Yes ☐ No ☐ N/A
9. Did Contractor refrain from "Selling" additional work?
☐ Yes ☐ No ☐ N/A
10. Are you satisfied with the quality of materials used in this project?
☐ Yes ☐ No ☐ N/A
11. Did Contractor leave premises free of construction debris?
☐ Yes ☐ No ☐ N/A
12. Do you feel you were treated fairly and in a non-discriminatory manner?
☐ Yes ☐ No ☐ N/A



Page 2
H/O Evaluation

13. Briefly, what is your evaluation of this Contractor?

14. Briefly, what is your evaluation of the city's Certified Housing Inspector?

15. Briefly, what is your evaluation of the city's Management Assistant?

16. General Comments: _____

NOTE: If you are dissatisfied with all of the work on your property, please write a detailed letter expressing why you are not satisfied, and describe the quality of workmanship.

Date

Homeowner

Witness

Homeowner